

**REMARKS/ARGUMENTS**

Claims 1-29 are pending in the application.

**Claim Rejections**

Claims 1-29 stand rejected under 35 U.S.C. 102(e) as being anticipated by Natarajan et al. (USPN 6,584,502) (hereinafter “Natarajan”).

Claim 1 recites:

A method comprising:  
identifying multiple policies to be combined together;  
determining whether any conflicts exist between the multiple policies;  
adding non-conflicting policies to a merged policy set; and  
resolving conflicting policies by selecting a preferred policy and including the preferred policy in the merged policy set.

Natarajan describes a technique for providing automatic event notification of changing network conditions to network elements in an adaptive, feedback-based data network. Natarajan discloses a policy engine 254, which is a decision-making component of the feedback-based adaptive network. (See Natarajan, col. 14, lines 5-9; Fig. 5C). The policy engine includes various plug-in policy modules 254a-254e. Each of the plug-in policy modules includes policies that are used to perform various actions. (See Natarajan, col. 14, lines 33-67). Thus, Natarajan discloses a system with policies that are included in modules of a policy engine.

Although Natarajan discloses the use of policies, Natarajan fails to disclose determining conflicts between the policies, adding non-conflicting policies into a merged policy set, and resolving conflicting policies, as recited in Claim 1.

Natarajan also fails to disclose the way in which conflicting policies are resolved by the method of Claim 1. Specifically, the method of Claim 1 includes “resolving conflicting policies by selecting a preferred policy and including the preferred policy in the merged policy set”. Natarajan does not disclose a “preferred policy” and the use of such policy to resolve conflicts. Because of these deficiencies, Natarajan fails to disclose the elements in Claim 1 and cannot be used to substantiate a rejection under 35 U.S.C. 102(e).

The Office Action argues that in Natarajan, conflict is an event, that determining a conflict is done by monitoring/detecting an event, and that resolving a conflict is done by making a decision and taking a correct action. (See Office Action, pages 8-9, para. 22). However, nothing in Natarajan discloses or suggests that a conflict is an event. Thus, the argument sets forth by the Office Action can only be supported using materials in the applicant’s application. Applicant respectfully submits that a conclusion based on such hindsight reconstruction cannot be used to substantiate a claim rejection. For the purpose of argument only, even assuming that the argument about the Natarajan reference stated in the Office Action can be properly made, Natarajan still fails to disclose the way in which conflicting policies are resolved by the method of Claim 1.

Thus, for at least the reasons stated above, Applicant respectfully submits that Claim 1 is not anticipated by Natarajan and is allowable. Given that Claims 2-13 depend from Claim 1, Claims 2-13 are also allowable for at least the same reasons.

Claim 14 recites:

A method comprising:  
identifying multiple policies to be combined together;  
determining whether any conflicts exist between the multiple policies;  
adding non-conflicting policies to a merged policy set;  
arranging conflicting policies in order from global policies to local policies;  
determining an intersection of the conflicting policies; and  
selecting a preferred policy based on the policy closest to the local policies and within the intersection of the conflicting policies.

As discussed above, Natarajan fails to disclose determining conflicts between policies, adding non-conflicting policies into a merged policy set, and using a preferred policy to resolve conflicts. Additionally, Natarajan fails to disclose the way in which conflicting policies are resolved by the method of Claim 14. In particular, Claim 14 recites “arranging conflicting policies in order from global policies to local policies”, “determining an intersection of the conflicting policies”, and “selecting a preferred policy based on the policy closest to the local policies and within the intersection of the conflicting policies”. Natarajan does not disclose arranging conflicting policies or selecting a preferred policy in the manner recited in Claim 14.

The Office Action argues that in Natarajan, arranging policies means deleting, plug-in, and updating policies. (See Office Action, page 9, para. 22). Natarajan discloses that policy modules and policies can be added and deleted. (See Natarajan, col. 14, lines 33-50). However, nothing in Natarajan discloses the scope associated with the policies or the arrangement of those policies in accordance with their scope. Thus, even though Natarajan discloses adding and deleting of policies, Natarajan fails to disclose arranging conflicting policies “in order from global policies to local policies”, as recited in Claim 14.

For at least the reasons stated above, Applicant respectfully submits that Claim 14 is not anticipated by Natarajan and is allowable. Given that Claims 15-19 depend from Claim 14, Claims 15-19 are also allowable for at least the same reasons.

Claim 20 recites:

An apparatus comprising:  
a storage device configured to store a merged policy set; and  
a management module coupled to the storage device and configured to identify multiple policies to be merged into the merged policy set, wherein the management module adds non-conflicting policies to the merged policy set and resolves conflicts among conflicting policies.

As stated above, Natarajan describes a policy engine and plug-in policy modules having various policies, but fails to disclose determining conflicts between policies, adding non-conflicting policies into a merged policy set, and resolving conflicting policies. Thus, Natarajan does not disclose the management module recited in Claim 20, which is configured to perform these steps. For at least these reasons, Applicant respectfully submits that Claim 20 is not anticipated by Natarajan and is allowable. Given that Claims 21-26 depend from Claim 20, Claims 21-26 are also allowable for at least the same reasons.

Claim 27 recites:

One or more computer-readable media having stored thereon a computer program that, when executed by one or more processors, causes the one or more processors to:  
identify multiple policies to be combined together in a merged policy set;  
determine whether any conflicts exist between the multiple policies;

- include non-conflicting policies in the merged policy set;
- resolve conflicting policies by:
  - selecting an allowed policy range;
  - selecting a preferred policy range that is included in the allowed policy range; and
  - including the preferred policy range in the merged policy set.

As discussed above, Natarajan fails to disclose determining conflicts between policies, adding non-conflicting policies into a merged policy set, and resolving conflicting policies. Natarajan also fails to disclose the steps to resolve conflicting policies, as recited in Claim 27. Particularly, Claim 27 includes “selecting an allowed policy range”, “selecting a preferred policy range that is included in the allowed policy range”, and “including the preferred policy range in the merged policy set”. Natarajan does not disclose an allowed policy range, a preferred policy range, or the use of these ranges to resolve conflicting policies. Thus, for the reasons stated above, Applicant respectfully submits that Claim 27 is not anticipated by Natarajan and is allowable. Given that Claims 28-29 depend from Claim 27, Claims 28-29 are also allowable for at least the same reasons.

### **Conclusion**

Claims 1-29 are in condition for allowance. Applicant respectfully requests the issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.